

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro No. 10-04658 (SMB)

**DEFENDANTS' OBJECTION TO ADMISSIBILITY OF TRUSTEE'S MADOFF-
AND/OR BLMIS-GENERATED EXHIBITS**

Defendants, Carol Nelson and Stanley Nelson, respectfully submit the following:

1. Defendants object to the Trustee's exhibits as inadmissible hearsay to the extent that they are Madoff- and/or BLMIS-generated records which lack any third party confirmation.

Dated: New York, New York
May 2, 2019

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
465 Park Avenue
New York, New York 10022
Phone & Fax: (888)-759-1114
hchaitman@chaitmanllp.com

*Attorneys for Defendants Carol Nelson
and Stanley Nelson*

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, a true and correct copy of the foregoing was served upon all parties in this action who receive electronic service through CM/ECF and via electronic mail upon:

BAKER & HOSTETLER
David J. Sheehan, Esq.
Marie L. Carlisle, Esq.
Nicholas J. Cremona, Esq.
Dean D. Hunt, Esq.
45 Rockefeller Plaza
New York, NY 10111
dsheehan@bakerlaw.com
mcarlisle@bakerlaw.com
ncremona@bakerlaw.com
dhunt@bakerlaw.com

Dated: New York, New York
May 2, 2019

/s/ Helen Davis Chaitman